Sanction Screening: Kazakhstan

Focus: Dual-use goods

Image: The illustration above is AI-generated.

Author: Aidan Sanderson (pseudonym)

Using Open Source Intelligence (OSINT), we have identified Kazakhstani companies involved in the trade of goods that can be used for both civilian and military purposes (commonly referred to as dual-use goods), including electronic integrated circuits classified under HS code 8542 (the Harmonised System code for electronic integrated circuits and microassemblies), computer chips, microchips, drones, servers, and advanced computing. They are high-priority items under the US and EU export control regimes.

While these goods have legitimate civilian uses, they are considered high risk in the current sanctions environment. Since 2022, export control authorities have

1 *Screening sanctions on Kazakhstan's dual-use goods*

raised concerns that dual-use goods may be diverted through third countries to reach sanctioned end users, particularly Russia. As a result, trade involving these goods requires closer scrutiny and enhanced monitoring.

These dual-use goods can be directly incorporated into military systems, intelligence platforms, surveillance tools, missile guidance, and unmanned weapons. Identifying companies engaged in dual-use trade helps regulators, financial institutions, and multinational firms assess exposure to secondary sanctions, enforcement actions, and reputational harm.

We aim to foster an understanding where sensitive dual-use technologies are moving, and who is involved, and whether those activities align with international norms and legal obligations of legitimate trade. Accurate identification and reporting are critical to safeguarding both global security interests and the integrity of lawful international commerce.

Key Questions:

- Has Kazakhstan's export of HS 8542 to Russia increased after 2022?
- Which Kazakhstan–based entities are involved in global trade of dual-use goods and may represent elevated sanctions-evasion or proliferation risk due to their trade patterns, counterparties, or rapid post-2022 expansion?

Trade Data Analysis

While Kazakhstan's exports of microchips (HS 8542) to Russia decreased from their 2022 peak, they have not fully returned to pre-sanctions levels in 2024.

Showing 1 to 5 of 5 Results

Extended Columns

Period	Trade Flow	Reporter	Partner	2nd Partner	Customs Desc	Transport Mode	Commodity Code	Trade Value (US$)	Net Weight (kg)	Gross Weight	Qty	Qty Unit	Alternate Quantity	Alt Qty Unit
2020	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$176,191	1,080.5	0	0	N/A	0	N/A
2021	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$245,946	982	0	0	N/A	0	N/A
2022	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$18,258,557	713,379.4	0	0	N/A	0	N/A
2023	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$15,609,835	136,967.6	0	0	N/A	0	N/A
2024	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$411,190	907.6	0	0	N/A	0	N/A

Show 25 rows

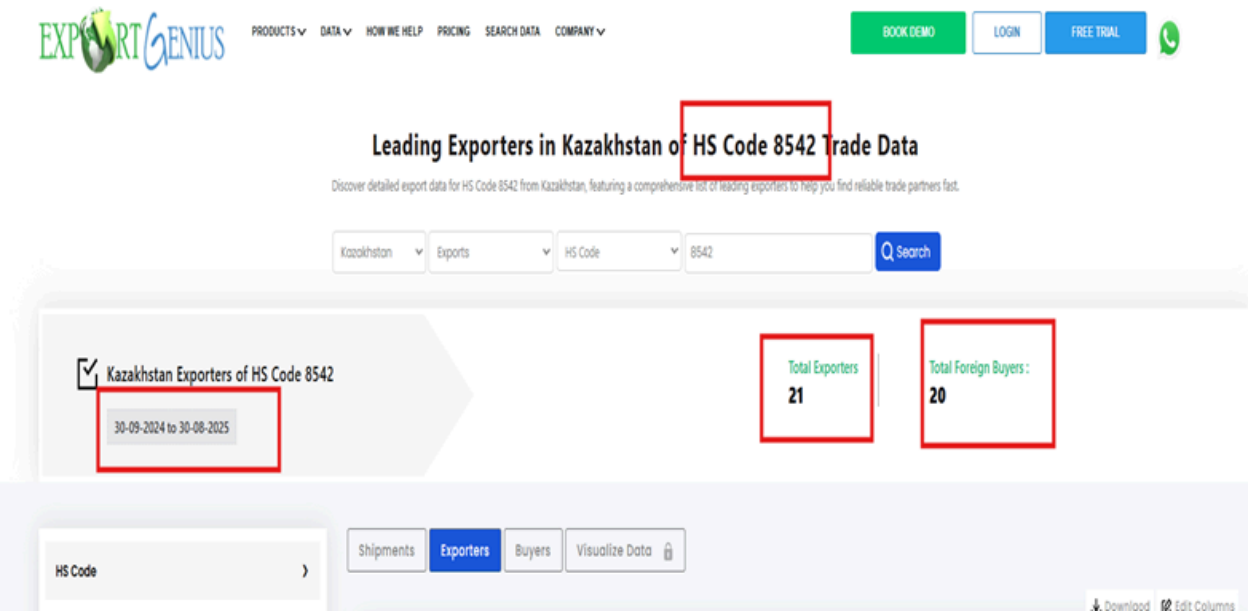
1

2 *Screening sanctions on Kazakhstan's dual-use goods*

Exports in 2024 (approximately $411,000 USD) remain higher than in 2021 (approximately $245,000 USD), suggesting continued post-sanctions trade activity above historical norms.

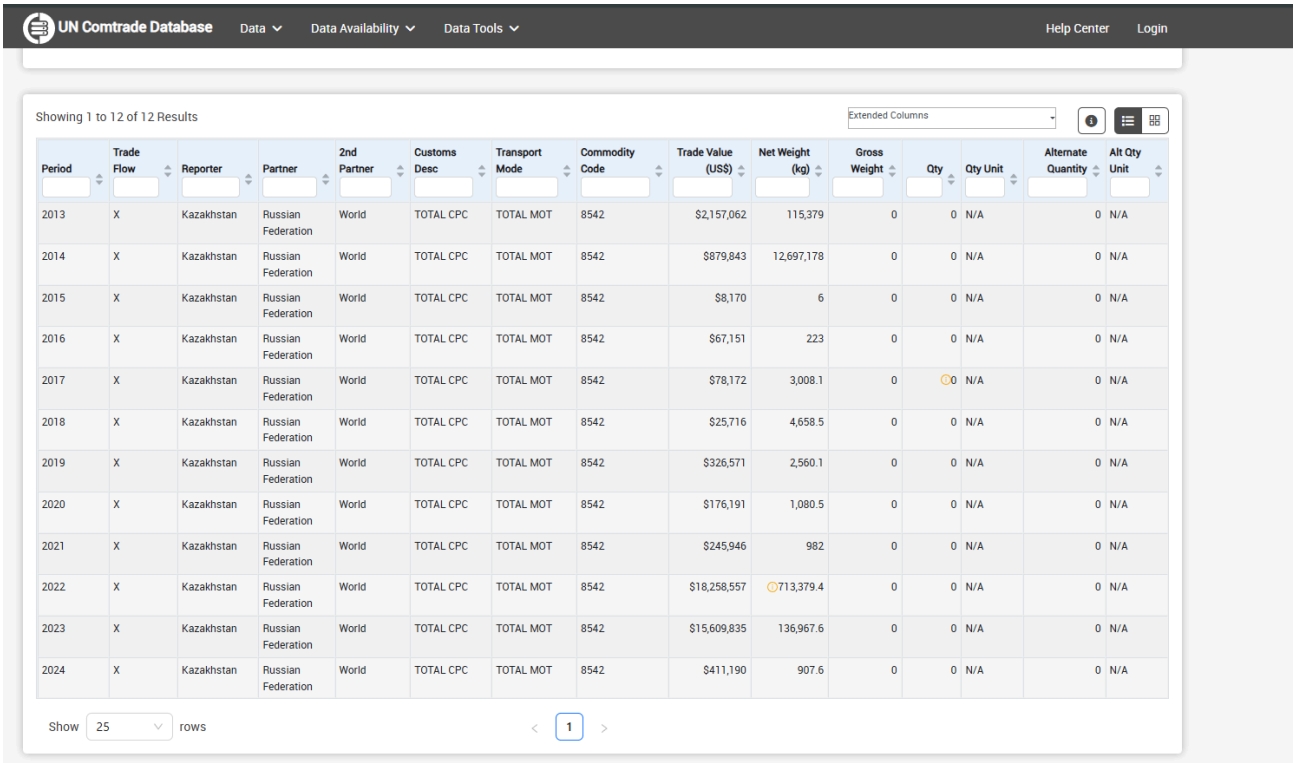
Identification of Kazakhstan Exporting Companies (HS Code 8542 and other dual-use goods)

Due to the lack of publicly accessible exporter level customs disclosures in Kazakhstan, the analysis relies on commercial trade intelligence databases that compile shipment level information from customs filings, logistics records, and mirror trade data. These include **ExportGenius**, which compiles customs



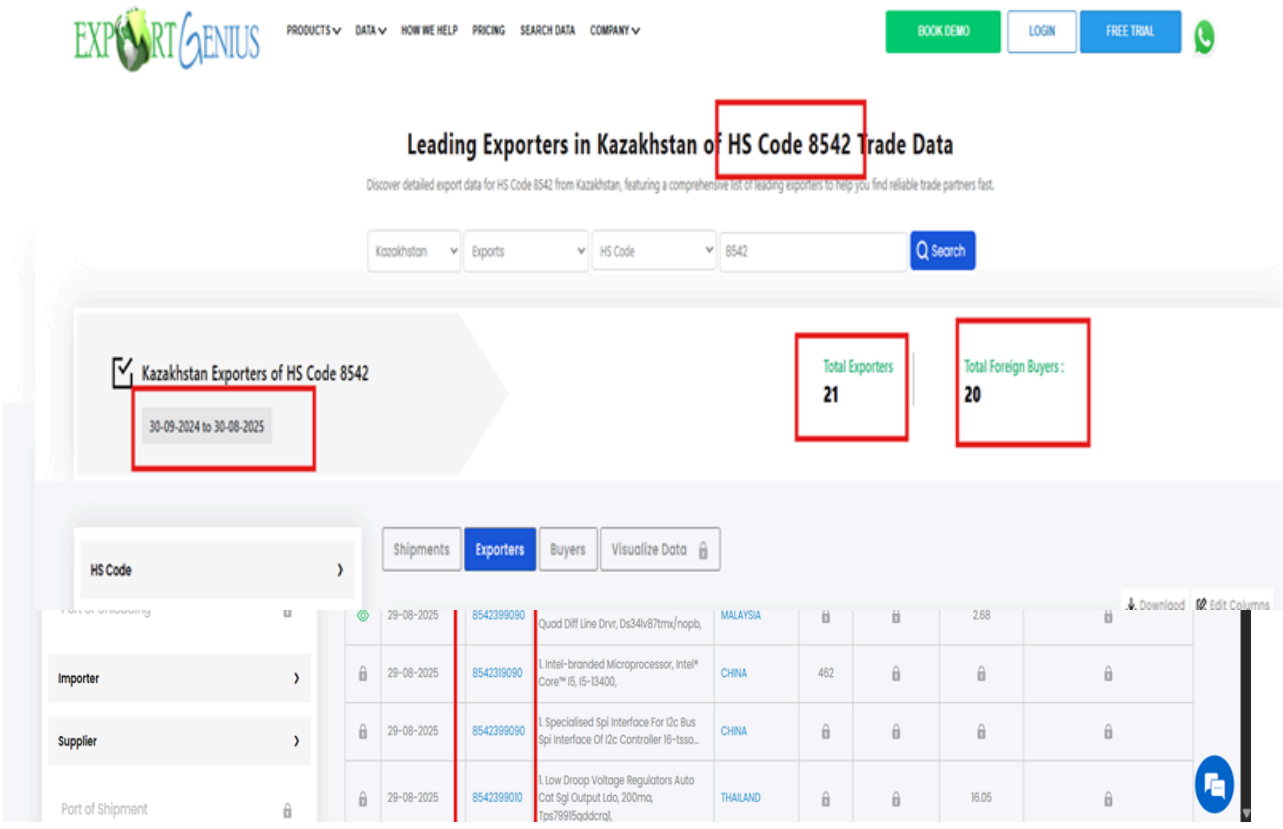
declarations, shipping manifests, and logistics records from multiple jurisdictions; and **UN Comtrade**, the United Nations' global database of official international merchandise trade statistics derived from reporting and mirror trade data submitted by national authorities, offering detailed historical and current import and export statistics for nearly 200 countries, categorised by product (using HS codes) and trading partner.

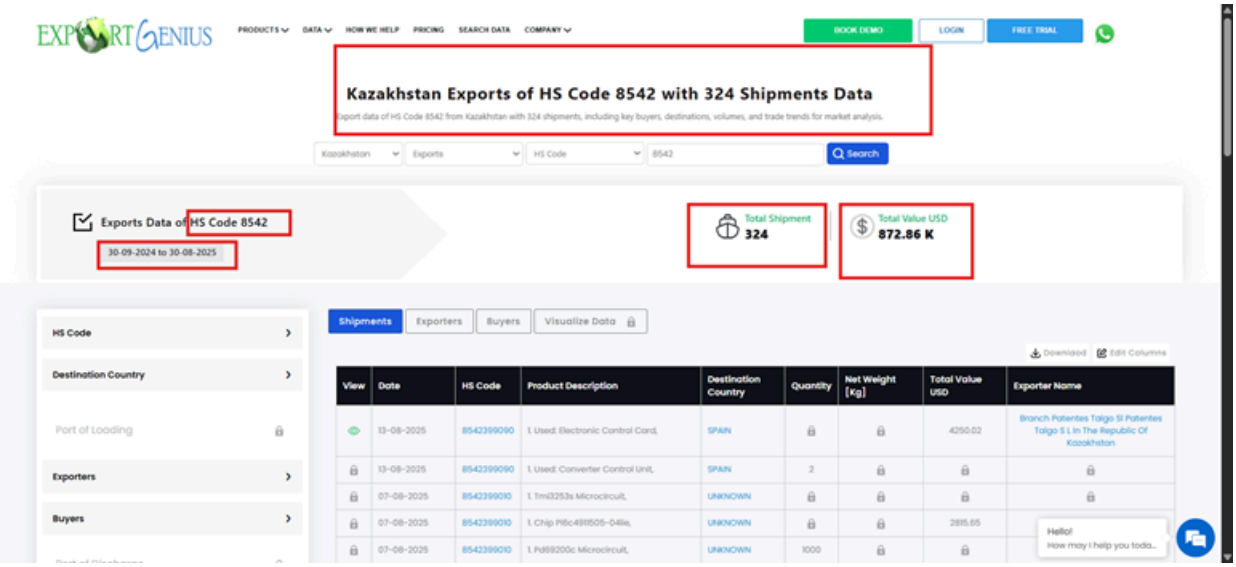
IF



Period	Trade Flow	Reporter	Partner	2nd Partner	Customs Desc	Transport Mode	Commodity Code	Trade Value (US$)	Net Weight (kg)	Gross Weight	Qty	Qty Unit	Alternate Quantity	Alt Qty Unit
2013	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$2,157,062	115,379	0	0	N/A	0	N/A
2014	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$879,843	12,697,178	0	0	N/A	0	N/A
2015	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$8,170	6	0	0	N/A	0	N/A
2016	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$67,151	223	0	0	N/A	0	N/A
2017	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$78,172	3,008.1	0	0	N/A	0	N/A
2018	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$25,716	4,658.5	0	0	N/A	0	N/A
2019	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$326,571	2,560.1	0	0	N/A	0	N/A
2020	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$176,191	1,080.5	0	0	N/A	0	N/A
2021	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$245,946	982	0	0	N/A	0	N/A
2022	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$18,258,557	713,379.4	0	0	N/A	0	N/A
2023	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$15,609,835	136,967.6	0	0	N/A	0	N/A
2024	X	Kazakhstan	Russian Federation	World	TOTAL CPC	TOTAL MOT	8542	$411,190	907.6	0	0	N/A	0	N/A

According to the trade intelligence data covering the period from September 30, 2024, through August 30, 2025, Kazakhstan recorded at least 324 export shipments classified under HS Code 8542, with a total declared value of approximately $873,000 USD. These shipments were associated with 21 Kazakhstani-based



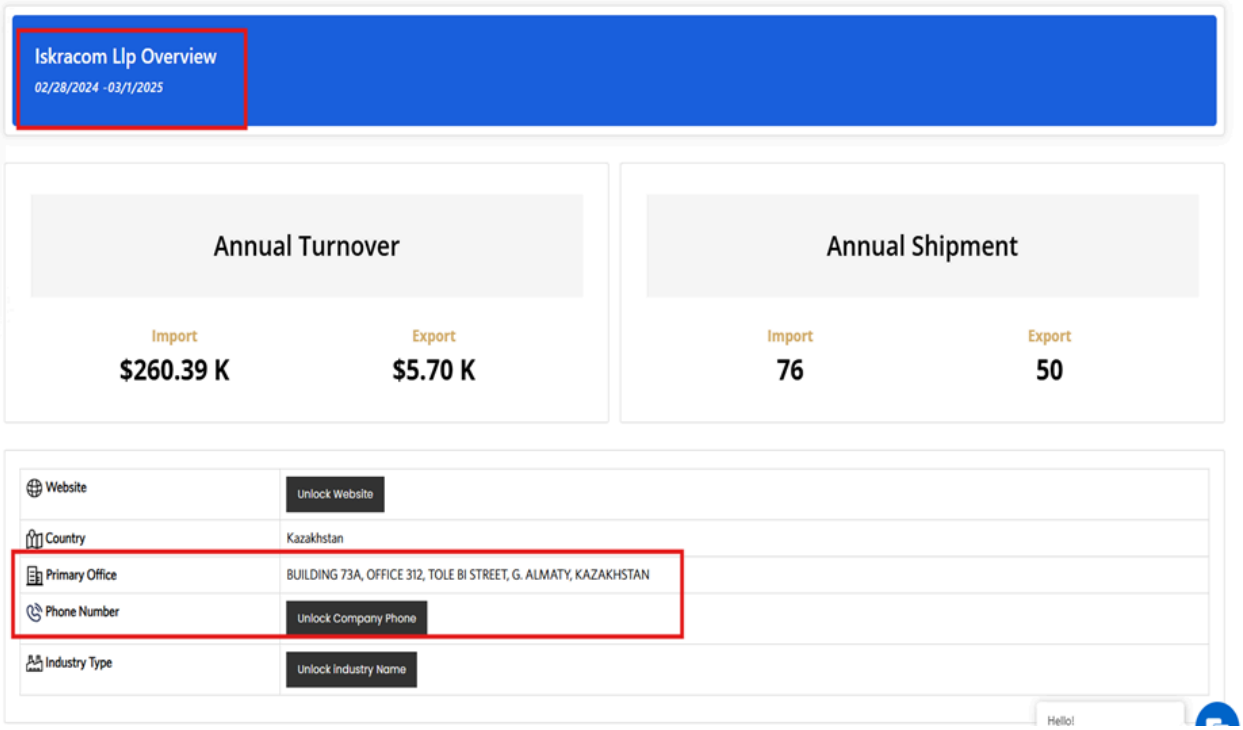


exporting entities and 20 foreign buyers. During the period from September 30, 2024, to August 30, 2025, Kazakhstan recorded approximately 6,920 import shipments classified under HS Code 8542, with a total declared value of roughly $44 million USD.

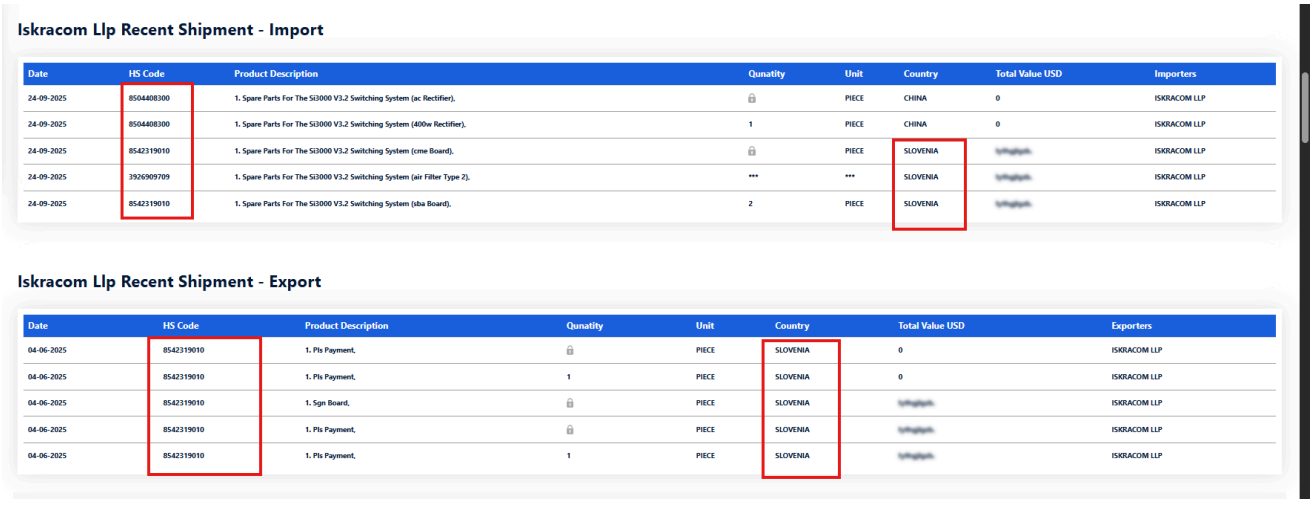
Company Profiling: Iskracom LLP, Eltexalatau LLP, and Profi Top LLC (Profi Top Llp)

Iskracom LLP is based in Almaty, Kazakhstan, at Building 73A, Office 312, Tole Bi Street. Between February 28, 2024, and March 1, 2025, the company had an import turnover of $260,390 USD and an export turnover of $5,700 USD, conducting 76 import shipments and 50 export shipments during this period.

IF



Recent imports on September 24, 2025, included spare parts for the SI3000 V3.2 Switching System. This included AC rectifiers and 400W rectifiers under HS code 8504408300 from China, and CME and SBA boards under HS code 8542319010, as well as air filters under HS code 3926909709, all from Slovenia.



Iskracom Llp Recent Shipment - Import

Date	HS Code	Product Description	Qunatity	Unit	Country	Total Value USD	Importers
24-09-2025	8504408300	1. Spare Parts For The Si3000 V3.2 Switching System (ac Rectifier),		PIECE	CHINA	0	ISKRACOM LLP
24-09-2025	8504408300	1. Spare Parts For The Si3000 V3.2 Switching System (400w Rectifier),	1	PIECE	CHINA	0	ISKRACOM LLP
24-09-2025	8542319010	1. Spare Parts For The Si3000 V3.2 Switching System (cme Board),		PIECE	SLOVENIA		ISKRACOM LLP
24-09-2025	3926909709	1. Spare Parts For The Si3000 V3.2 Switching System (air Filter Type 2),	***	***	SLOVENIA		ISKRACOM LLP
24-09-2025	8542319010	1. Spare Parts For The Si3000 V3.2 Switching System (sba Board),	2	PIECE	SLOVENIA		ISKRACOM LLP

Iskracom Llp Recent Shipment - Export

Date	HS Code	Product Description	Qunatity	Unit	Country	Total Value USD	Exporters
04-06-2025	8542319010	1. Pls Payment,		PIECE	SLOVENIA	0	ISKRACOM LLP
04-06-2025	8542319010	1. Pls Payment,	1	PIECE	SLOVENIA	0	ISKRACOM LLP
04-06-2025	8542319010	1. Sgn Board,		PIECE	SLOVENIA		ISKRACOM LLP
04-06-2025	8542319010	1. Pls Payment,		PIECE	SLOVENIA		ISKRACOM LLP
04-06-2025	8542319010	1. Pls Payment,	1	PIECE	SLOVENIA		ISKRACOM LLP

Recent exports on June 4, 2025, were all under HS code 8542319010 and included items described as PLS Payment, SGN Board, CME Board, and SBA Board, with shipments sent to Slovenia.

IF

Iskracom Llp Recent Shipment - Export

Date	HS Code	Product Description	Qunatity	Unit	Country	Total Value USD	Exporters
04-06-2025	8542319010	1. Pls Payment,		PIECE	SLOVENIA	0	ISKRACOM LLP
04-06-2025	8542319010	1. Pls Payment,	1	PIECE	SLOVENIA	0	ISKRACOM LLP
04-06-2025	8542319010	1. Sgn Board,		PIECE	SLOVENIA		ISKRACOM LLP
04-06-2025	8542319010	1. Pls Payment,		PIECE	SLOVENIA		ISKRACOM LLP
04-06-2025	8542319010	1. Pls Payment,	1	PIECE	SLOVENIA		ISKRACOM LLP

Eltexalatau Llp Overview

02/28/2024 -03/1/2025

Annual Turnover

Import	Export
$3.35 Mn	$1.38 Mn

Annual Shipment

Import	Export
236	1.45 K

volza GROW GLOBAL

Book A Live Demo | Countries | Features | Pricing | More | Login | Sign Up For Free

Overview | Markets | Import Shipment | Export Shipment | Supply Chain Intelligence | Competition | Bill of Lading

Eltex Alatau Llp Almaty, Kazakhstan is an exporter and importer with 17 export shipments to 1 buyers and 726 import shipments from 13 suppliers.

Exports:

According to Volza's global trade data:

Eltex Alatau Llp has exported **17 shipments** to **1 verified buyers** across key markets, including **India** .

Products exported by the company primarily fell under the following **HSN Codes:**

- HSN 8517

Top buyers include:

- Vijaya Bhanu Digital Nexus Private Limited

These insights help exporters evaluate trading patterns, product focus, and shipment scale, and identify the right buyers using the Matchmaker tool. Meanwhile, tools like Buyer Risk Radar provide deeper visibility into buyer behavior and associated risks, enabling stronger sourcing and market decisions.

Imports:

On the import side, **Eltex Alatau Llp** sustains a well-diversified sourcing network, with **726 shipments** recorded from **13 verified suppliers** across **China** , **Taiwan**.

Products imported by the company primarily fell under the following **HSN Codes:**

- HSN 8533
- HSN 8532
- HSN 8542

Leading suppliers include :

[redacted]
President & Chief Executive Officer

Unlock direct access to Eltex Alatau Llp's top decision makers! Get phone numbers, emails, and LinkedIn profiles. Enjoy a 100% response rate, or get your money back!

Phone | Linkedin | Email

20 Decision Makers

Eltex Alatau Llp

743 Bill of Ladings, 1 Buyers and 13 Suppliers

DEMO

7 *Screening sanctions on Kazakhstan's dual-use goods*

IF

Secondly, the trade data for **Eltexalatau LLP** indicate sustained activity in the import and export of electronic equipment and components during the period February 2024 to March 2025.

The company recorded an annual import value of approximately $3.35 million USD and export value of $1.38 million USD, with a notably high shipment frequency, including over 230 import shipments and more than 1,400 export shipments.

The trade data indicate that Eltexalatau LLP is actively engaged in the import and export of electronic equipment and components, including goods classified under HS Codes 8517620003, 8504403008, 8504509500, 8542399010, and 7318155900. Among these, HS Code 8542399010, covering integrated circuits and microcircuits, is of particular relevance from an export-control perspective, as such components are widely recognised as dual-use goods due to their potential

Eltexalatau Llp Recent Shipment - Import

Date	HS Code	Product Description
29-08-2025	8517620003	1. Ethernet Switch, Model: Mes2300-48p Ver Ps,
22-07-2025	8517620003	1. Ethernet Switch,model: Mes2324p Ac,
24-06-2025	8517620003	1. Ethernet Switch, Model: Mes2348b,
19-06-2025	8504509500	1. Throttle,
19-06-2025	8542399010	1. Integrated Circuit,

Eltexalatau Llp Recent Shipment - Export

Date	HS Code	Product Description
12-08-2025	8504403008	1. Power Supply Module,
07-08-2025	8504509500	1. Ferrite Bead Acms160808a601,
07-08-2025	8504509500	1. Inductance Swpa5040s3r3nt,
07-08-2025	8542399010	1. Tmi3253s Microcircuit,
07-08-2025	7318155900	1. Screw Half/heel Cross/sh Din 7985 4.8 M 3x35 H Oc,

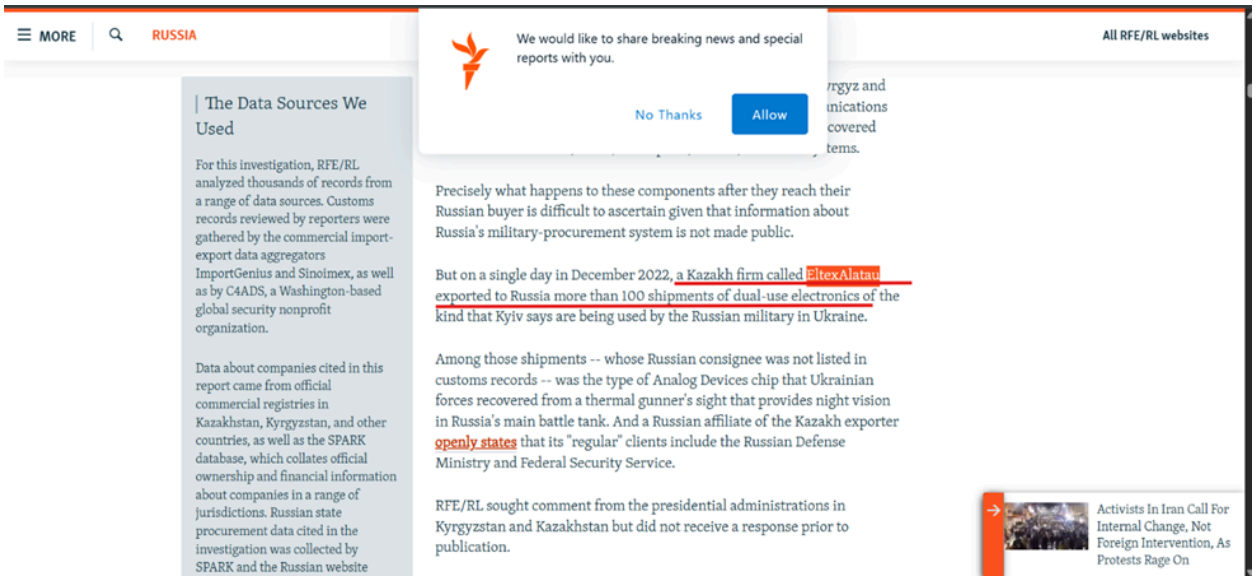
application in advanced telecommunications, industrial automation, and military or

surveillance technologies. The company's imports of integrated circuits from China, combined with its export activity involving microcircuit products, indicate access to and handling of controlled electronic components.

Eltexalatau Llp Recent Shipment - Import

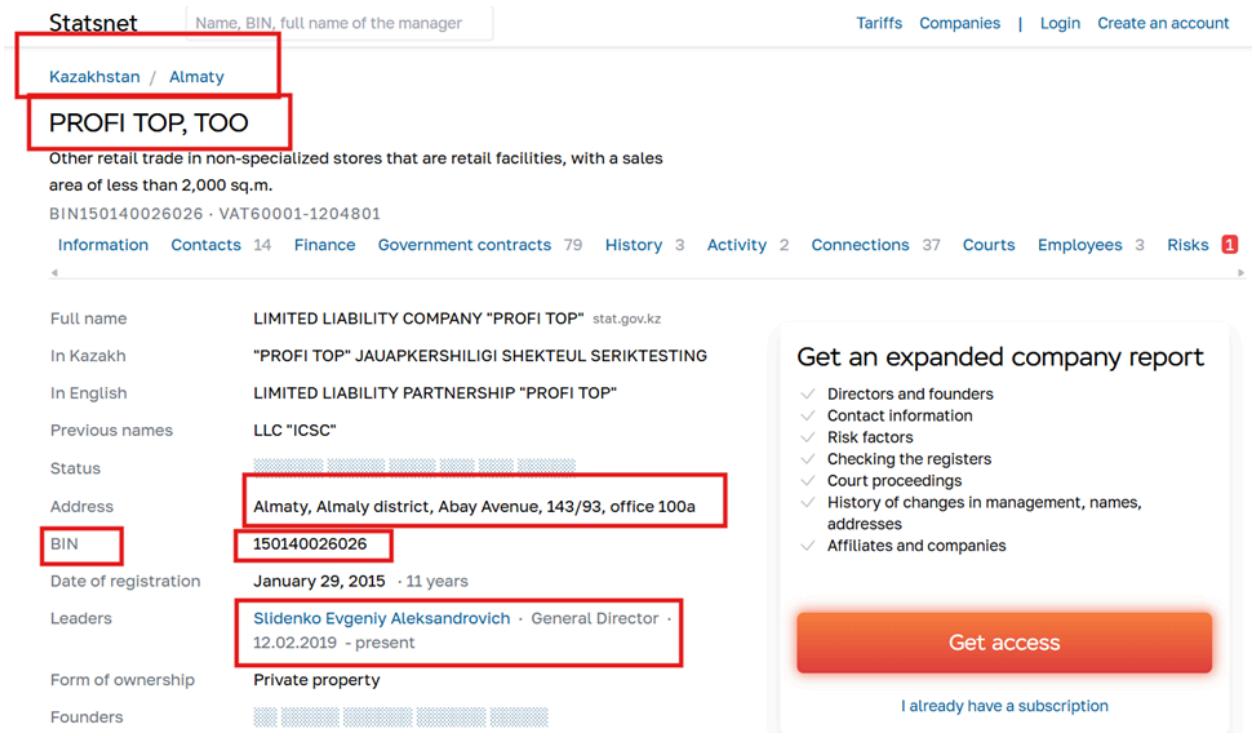
Date	HS Code	Product Description	Qunatity	Unit	Country
29-08-2025	8517620003	1. Ethernet Switch, Model: Mes2300-48p Ver Ps,		PIECE	UNKNOWN
22-07-2025	8517620003	1. Ethernet Switch,model: Mes2324p Ac,	200	PIECE	UNKNOWN
24-06-2025	8517620003	1. Ethernet Switch, Model: Mes2348b,		PIECE	UNKNOWN
19-06-2025	8504509500	1. Throttle,		PIECE	CHINA
19-06-2025	8542399010	1. Integrated Circuit,	6000	PIECE	CHINA

Investigations by RFE/RL and other sources have alleged that Eltexalatau LLP and other Kazakh companies have been involved in the re-export of sanctioned Western dual-use electronics (such as integrated circuits and capacitors) to Russian companies that supply the Russian military, thereby helping Russia circumvent sanctions.


MORE
RUSSIA
All RFE/RL websites
We would like to share breaking news and special reports with you.
No Thanks
Allow
The Data Sources We Used
For this investigation, RFE/RL analyzed thousands of records from a range of data sources. Customs records reviewed by reporters were gathered by the commercial import-export data aggregators ImportGenius and Sinoimex, as well as by C4ADS, a Washington-based global security nonprofit organization.
Data about companies cited in this report came from official commercial registries in Kazakhstan, Kyrgyzstan, and other countries, as well as the SPARK database, which collates official ownership and financial information about companies in a range of jurisdictions. Russian state procurement data cited in the investigation was collected by SPARK and the Russian website
Precisely what happens to these components after they reach their Russian buyer is difficult to ascertain given that information about Russia's military-procurement system is not made public.
But on a single day in December 2022, a Kazakh firm called EltexAlatau exported to Russia more than 100 shipments of dual-use electronics of the kind that Kyiv says are being used by the Russian military in Ukraine.
Among those shipments -- whose Russian consignee was not listed in customs records -- was the type of Analog Devices chip that Ukrainian forces recovered from a thermal gunner's sight that provides night vision in Russia's main battle tank. And a Russian affiliate of the Kazakh exporter openly states that its "regular" clients include the Russian Defense Ministry and Federal Security Service.
RFE/RL sought comment from the presidential administrations in Kyrgyzstan and Kazakhstan but did not receive a response prior to publication.
Activists In Iran Call For Internal Change, Not Foreign Intervention, As Protests Rage On

IF

Thirdly, **Profi Top LLC** (**Profi Top Llp**) "PROFI TOP" is a Kazakhstan-registered company based in Almaty, Kazakhstan, in the Almaly district at Abay Avenue 143/93, Office 100a. The company's Business Identification Number (BIN) is 150140026026. Since February 12, 2019, the company information was reviewed using public sources.



The trade data show that Profi Top LLC conducted a mirrored import and export transaction involving goods classified under HS Code 8542319090, as illustrated below.

IF

Profi Top Llp Recent Shipment - Import

Date	HS Code	Product Description	Qunatity	Unit	Country
29-08-2025	8542319090	1. V_pro8 Audio Signal Processor Includes: Dualfib 981/60-80-2 Sfp Module, Madi Sfp Module 981/60-82-1 Pc, Rma #244144,		PIECE	GERMANY
26-08-2025	9031809800	1. Phabrix Sxa Rasteriser,	1	PIECE	UNITED KINGDOM
26-08-2025	8544700000	1. Sfp-10g-pc02 Cable 2m Duplex,	***	***	CHINA
26-08-2025	9031809800	1. Phsxdl-01 Sxd Razerizer,		PIECE	UNITED KINGDOM
26-08-2025	8302490009	1. Phqx01 Fastener Kit,	***	***	UNITED KINGDOM

Profi Top Llp Recent Shipment - Export

Date	HS Code	Product Description	Qunatity	Unit	Country
14-07-2025	8542319090	1. V_pro8 Audio Signal Processor Includes: Dualfib 981/60-80-2 Sfp Module, Madi Sfp Module 981/60-82-1 Pc, Rma #244144,		PIECE	GERMANY
17-04-2025	8529904900	1. Mv-825-rtr Multi-window Video Monitoring Module Case,	***	***	BELGIUM

The company imported an audio signal processing device with associated SFP modules from Germany on April 25, 2025 and subsequently exported an identical item under the same HS code and product description on March 13, 2025, with Germany again listed as the counterparty.

The trade data covering the period from February 2024 to March 2025 indicate that Profi Top LLC has a very limited volume of international trade activity, recording only one import shipment and one export shipment during the year. The company's annual turnover during this period amounted to approximately $75,900 USD in imports and $72,000 USD in exports.

Both transactions involved goods classified under HS Code 8542319090, corresponding to electronic integrated circuits. The imported and exported items

Profi Top Llc Recent Shipment - Import

Date	HS Code	Product Description	Qunatity	Unit	Cou
25-04-2025	8542319090	1. V_pro8 Audio Signal Processor Included: Sfp Mod Lc Dualfib 981/60-80 - 2 Pcs,madi Sfp Module 981/60-82 - 1 Pc,		PIECE	GERM

Profi Top Llc Recent Shipment - Export

Date	HS Code	Product Description	Qunatity	Unit	Cou
13-03-2025	8542319090	1. V_pro8 Audio Signal Processor Included: Sfp Mod Lc Dualfib 981/60-80 - 2 Pcs, Madi Sfp Module 981/60-82 - 1 Pc,		PIECE	GERM

share identical product descriptions, consisting of an audio signal processor with associated SFP optical modules, with Germany listed as the counterpart country in both cases. Other exporters among the 21 identified companies may also be involved in similar trade patterns, though publicly available data is limited.

Analysis

The companies listed are publicly known to trade dual-use goods. The main concern is the movement of "dual-use" electronic goods, such as microchips and integrated circuits, which can be used for both civilian and military purposes. These goods are controlled because they could ultimately be used in weapons, drones, communications systems, or surveillance equipment by the Russian military.

Our analysis of the data shows that exports of sensitive electronic goods continued after 2022, and at higher levels than before. It is a strong warning sign that some trade routes may still be active for re-exporting these sensitive goods. Further evidence comes from specific cases, such as Eltexalatau LLP, where investigative journalists documented links between the company and the re-export of Western dual-use electronics to Russian military linked companies.

This confirms that Kazakhstan has already been used as a transit route for goods subject to sanctions. It justifies closer monitoring, stronger compliance checks, and a thorough review of ongoing sanctions risks in the region.

Sources to look into:

[1] https://comtradeplus.un.org/
[2] https://www.exportgenius.in/export-data/kazakhstan/hs-code-8542.php
[3] https://www.exportgenius.in/company/iskracom-llp/f1c56d744cd0674ad976329f23bd4262
[4] https://pk.uchet.kz/search?text=Iskracom&page=1
[5] https://www.exportgenius.in/company/eltexalatau-llp/6e13a997befebb45f79c529aaa644509
[6]https://www.rferl.org/a/kyrgyz-kazakh-firms-investigation-western-tech-russia-war-ukraine/32467795.html
[7] https://statsnet.co/companies/kz/41142301#activity
[8] https://www.exportgenius.in/company/profi-top-llp/d658ad3d514495582b926dc7f5dffbef
[9] https://www.exportgenius.in/company/profi-top-llc/62a9820e41642050cc996fed761eb2e2
[10] https://www.exportgenius.in/import-data/kazakhstan/hs-code-8542.php